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**STATES ACTION ON BUSINESS ENABLING REFORMS (SABER)
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**INVESTMENT PROJECT FINANCING (IPF)
TECHNICAL ASSISTANCE COMPONENT**

ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN (ESMP)

June 2025



ACRONYMS AND ABBREVIATIONS

Name	Description
E&S	Environmental and Social
EHS	Environmental Health and Safety
ES COP	Environmental and Social Code of Practices
ESHS	Environmental, Social, Health and Safety
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESMS	Environmental and Social Management System
H&S	Health and Safety
IDA	International Development Association
IFC	International Finance Corporation
OHS	Occupational Health and Safety
CoC	Code of Conduct
SEA/SH	Sexual Exploitation and Abuse/Sexual Harassment
SABER	States Action on Business Enabling Reforms Program
GBV	Gender Base Violence
ESF	Environmental and Social Framework
HVAC	Heating, Ventilation, and Air Conditioning
MoU	Memorandum of Understanding
NG	Net Gain
NNL	No Net Loss
NPI	Net Positive Impact (net gain)
PPE	Personal Protective Equipment
SEP	Stakeholder Engagement Plan
UXO	Unexploded ordnance
WB ESS	World Bank Environmental and Social Standards



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1.0 INTRODUCTION

1.1 PROJECT BACKGROUND

States Action on Business Enabling Reforms Program (SABER) is designed to support the most critical state-level business enabling reforms of the Government's SABER program, which is anchored in the National Development Plan (NDP) 2021-2025's Business Environment, Trade and Competitiveness Pillar. . The Program Development Objectives (PDO) is to improve (1) the efficiency of land administration, (2) the regulatory framework for private investment in fiber optic infrastructure, (3) services provided by investment promotion agencies and public-private partnership units, and (4) the efficiency and transparency of government-to-business services in participating states.

The Program is expected to be a subset of the Government's program to improve the business enabling environment at the state level. The duration of the SABER Program-for-Results (PforR) is for 3 years, from 2023 to 2025. The IPF Component for Technical Assistance (the Project) will provide implementation support and capacity strengthening for the Project Coordinating Unit (PCU), implementing units, partners, and participating states.

1.2 RATIONALE FOR THE ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN (ESMP)

To renovate and replace the roof and ceilings of the SABER PCU Office, the IPF project component of the SABER Program anticipates environmental and social low risks which have now triggered the need to develop a site specific, coated, measurable, and monitorable actions that can be effectively mitigated with appropriate measures. It is imperative for the E&S specialist of the SABER PCU to conduct an assessment of potential environmental and social risks that may arise from renovation activities and formulate a technical guide for managing these risks should they come up. Any adverse impacts will be addressed through suitable mitigation measures. The ESMP was prepared in line with international practices, the World Bank's Environmental and Social Framework (ESF), and National Environmental Legislation of Nigeria which outlines a process for addressing environmental and social standards throughout the implementation and effectiveness sub-projects which also ensures that the substantive requirements of the World Bank's Environmental and Social Framework, are met and addressed.

Due to the low potential environmental and social risks and impacts that may be associated with the SABER PCU Office renovation, the following Environmental and Social Standards (ESSs) applies: ESS1: Assessment and Management of Environmental and Social Risks and Impacts; ESS2: Labor and Working Conditions; ESS3: Resource Efficiency and Pollution Prevention and Management; ESS 4: Community Health and Safety; ESS10: Stakeholder Engagement and Information Disclosure.



Renovation activities can have potential negative environmental and social (E&S) impacts, which depend on the program type and scale, sensitivity of the site, nature, significance, magnitude and duration of its potential E&S impacts, complexity of issues raised and reliability of mitigation. The potential E&S impacts have to be managed and mitigated through an environmental and social management plan (ESMP), which constitutes simplified ESMP. The grantee is required to develop the ESMP for small works and renovation activities with lower environmental and social risks and impacts, respectively. Larger infrastructure and renovation work, that might entail higher E&S risks and impacts, will require an environmental and social impact assessment (ESIA) at the end of the renovation. Further information and guidance on conducting the ESIA are provided in Appendix. It is important to note, that ESMP is a regular part of the ESIA as well.

The requirement to develop the ESMP is stated in the SABER environmental and social action plan (ESAP) that will be part of the agreement between the SABER PCU and Contractor.

This document serves as ESMP template, capturing the typical E&S impacts and associated mitigation measures that need to be considered for SABER programs that include renovation activities. The grantee together with the contractor, if applicable - shall use this ESMP template and adapt it to the specifications of the renovation activities, characteristics, and risks.

The purpose of developing these ESMP is to assist the grantee in identifying and documenting program specific E&S risks, impacts and in defining applicable risk mitigation measures.

The SABER PCU will typically, but not obligatory, engage renovation contractor(s) or undertake the works. It is the responsibility of the PCU to undertake an overall E&S risk assessment for the planned interventions and to prepare the ESMP commensurate to the level and significance of these risks and impacts. The PCU will work in line with the provisions of this ESMP guidance to include the ESMP in the contract between the grantee and its renovation contractor(s), and to ensure that the relevant ESMP requirements are implemented during program implementation. If necessary, the ESMP is to be adapted by the grantee or contractor to reflect site specific environmental and social risks as well as the contractor's methods to address these risks most accurately.

1.3 APPLICABLE STANDARDS

The full list of applicable standards for developing the ESMP is indicated in the SABER ESMS manual document. In addition, the World Bank Group Environmental, Health, and Safety Guidelines was reflected. These guidelines were used as a technical reference document with general and industry-specific examples of good international industry practice.

1.4 GENERAL PROVISION

In the context of the SABER Program Coordination Unit (PCU) office, renovation activities are likely to include small works, and renovation activities are assumed to have low E&S risks.



The ESMP includes chapters on the following topics:

- Description of renovation activities,
- Roles and responsibilities,
- Training requirements,
- Monitoring and reporting.

The main part of the ESMP comprises the mitigation measures according to the means of verification (indicators), responsibilities and the means of monitoring.

Furthermore, during the renovation activities, the grantee has to avoid significant adverse impacts to cultural heritage. The E&S risks and impacts identification process (e.g., ESIA study) should determine whether the proposed location is in areas where cultural heritage is expected to be found, either during renovation or operations. Appendix D provides guidance on the development and implementation of a chance finding procedure. Guidance on how to conduct the ESIA is provided in Appendix E and should be followed by the grantee and/or its contractors if ESIA is required for the program activities.

1.5 PURPOSE

This Environmental and Social Management Plan (ESMP) has been developed by the Federal Ministry of Finance, Program Coordination Unit office (SABER PCU) to guide the renovation and replacement of the damaged roofs and ceilings of the SABER PCU Office Space. SABER PCU has prepared this ESMP to guide the mitigation and response to the potential E&S risks that are likely to occur during the renovation of the existing office building and space for continued coordination operations of the SABER programme activities.

The purpose of this ESMP is to consider and develop proper measures and controls to decrease the potential for occupational health and safety hazards during all phases of the project, and to provide clearly defined action plans and emergency response procedures to account for human and environmental health and safety. This ESMP provides a practical plan to mitigate and respond to the potential E&S risks identified for the proposed renovation of the building.

Implementation Arrangements for the Office Renovation - The renovation and refurbishment of the office flat will be led and executed by external contractors, the Federal Ministry of Finance Maintenance and Engineering Team would provide oversight function of supervision, while the SABER E&S would monitor to ensure compliance with the E&S standards. The respective institutional roles are summarized in the table below.

Table 1: Implementation arrangements for Renovation of the SABER PCU Office

Partner	Role
SABER PCU and	<ul style="list-style-type: none"> • Monitoring environmental and social risks, and ensure compliance to E&S standards • Supervise the renovation and replacement of roofs and ceilings activities



FMOF Maintenance	
Contractor	<ul style="list-style-type: none"> • Execute the renovation work of the SABER PCU office. • Facilitate procurement of supplies and equipment necessary for the delivery of the renovation of the office • Deploy staff for the implementation of key technical designs.

1.6 OBJECTIVES OF THE ASSIGNMENT

The objective of this assignment is to develop an ESMP that consists of a clearly established set of mitigation measures, specific to the project site, coated, monitorable, and institutional actions. These actions are intended to be implemented before and during the sub-project execution to eliminate any adverse environmental and social impacts or mitigate them to acceptable levels. The plan includes the measures required to implement these actions, addressing the adequacy of the monitoring and institutional arrangements in the intervention sites.

These ESMP is also to ensure that the environmental requirement, social commitments, and health and safety risks associated with the program are carried forward into the renovation and operational phases of the program and are effectively managed. The ESMP have to ensure that the program operates with national requirements of Nigeria as well as the applicable standards and provide a reference against which future monitoring and evaluation can be undertaken.

- Provide an assessment of the environmental and social risks of the renovation activities.
- Detail the measures to be taken during the implementation and operation of the project to eliminate, mitigate or offset adverse environmental and social impacts or reduce them to acceptable levels.
- Develop environmental & social management and monitoring plans in compliance with the relevant environmental laws.

1.7 SCOPE OF WORK

The proposed intervention will entail the following design and allied activities.

- Refurbishment and renovation of the existing SABER PCU Office
- A replacement of the damaged roof and ceilings
- Disposal of contaminated/damaged roofs and ceilings
- Updating and enhancing essential utilities like electricity, water supply, and sanitation.
- Utilizing sustainable, locally sourced materials wherever possible to minimize the environmental impact of the renovations.
- Implementing energy-efficient solutions such as LED lighting, solar panels, and energy-efficient HVAC systems.
- Installation of modern security systems for the safety of personnel and the protection of equipment and data.



2.0 DESCRIPTION OF THE EXISTING OFFICE BUILDING AND PROPOSED ACTIVITIES

2.1 Current Status of the Office

The existing building designated for the SABER PCU is located at the fourth floor of the Federal Ministry of Finance, Abuja, Nigeria, room 409 and 410, The existing building is owned by Federal Ministry of Finance which houses the PCU, The current conditions which requires a series of refurbishments that meets the operational needs of the Office is presented as follows - Overall, the building presents damaged roofing sheets leading to rain leakages into the office premises through the walls, electrical shocks from wet wires etc, these suggest that the SABER PCU office needs to undergo an urgent **repairs** indicating the following current conditions:

- Roofing: The existing roofing sheets and waterproof felt are damaged or deteriorated, requiring complete removal and replacement. New aluminium long-span sheets, clips, screws, and sealants are planned, suggesting leakage or structural issues with the current roof.
- Ceiling: Installation of moisture-resistant, ceiling tiles and accessories indicates that the current ceiling may be water-damaged or outdated.
- Waterproofing: The need for new waterproof felt and primer gas application implies poor waterproofing in the current structure.
- Electrical Wiring: Trunking of wires is included, suggesting exposed or disorganized electrical wiring. The current downpour is creating electrical circuit risk
- Drainage: Installation of new floor drains points to inadequate or failing drainage systems.
- Painting: Full repainting with undercoat and two coats of premium paint implies worn or faded wall finishes.
- Cabinetry: New cabinets and drawers are planned, indicating outdated or insufficient storage solutions.

Table 2: Current Status of the office

Aspects /elements of the building	Current Status
General Condition	Usage Status: The building has been emitting Fungus Mold smells which has caused most of the staff to continuously treat mold infection, Catarrh, or Cough. Most of the PCU staff working there constantly work in an unhealthy and unsafe environment due to the electrical sparks and falling ceilings in some office. Structural Integrity: The structural integrity of the building appears sound, making it suitable for refurbishment rather than requiring a complete rebuild, except the roof and ceilings
Office Spaces	Office Areas: The building accommodates office spaces, which require refurbishment for continued functional use.



Fixtures and Fittings	<p>Air Conditioning: Some air conditioning units are present but would be serviced after the renovation is completed or may be replaced.</p> <p>Furniture: Items such as work stations are still in place. They are in good condition, although the wooden cabinet are in a condition that allows refurbishment and reuse.</p> <p>General Fixtures: Other general fixtures, including doors and light fixtures, are present but may require updating or replacement to meet the new operational needs.</p>
Utilities	<p>Availability of Utilities: Essential utilities like electricity, water supply, internet connection, and sanitation facilities are already available and functioning in the building.</p>
Aesthetics and Ambience	<p>Internal Aesthetics: The interior of the building aligns with the Ministry and shall not be tampered with.</p> <p>External Appearance: The external appearance of the office, including the frontage would be left as current state.</p>

2.2 ENVISIONED STATUS OF THE OFFICE

The transformation/ renovation of the office is expected to be:

- **Structurally Upgraded:** With a new aluminium long-span roofing system, waterproofing, and ceiling tiles, the space will be more resilient to weather and moisture.
- **Healthy and Safe Work Environment:** The renovations aim to create a healthier and safer working environment with better ventilation, lighting, and drainage leading to increased productivity.
- **Aesthetically Enhanced:** Fresh painting and modern ceiling finishes will improve the visual appeal and ambience. Moisture-resistant ceiling tiles and fresh coats of premium paint will enhance aesthetics and indoor air quality.
- **Functionally Improved:** Installation of floor drains, electrical trunking, and built-in cabinetry will enhance usability, safety, and organization.

2.3 ENVISIONED USE OF THE OFFICE

The renovated office is intended for continued program activities from;

- **Professional Workspaces:** Suitable for all PCU staff
- **Client Engagements:** A presentable and functional space for coordination activities.
- **Long-Term Occupancy:** Durable materials and finishes suggest the space is designed for sustained use with minimal maintenance.

2.4 LABOR DEPLOYMENT OF SKILLED AND UNSKILLED LABOR WILL BE A CRUCIAL PART OF THE RENOVATION PROCESS.

External Contractors will be the primary labor force to ensure, organizational standards. These workers will handle core tasks such as dismantling, installation, and finishing work. And for the Contingency Labor support, a contingency plan with the Ministry of Finance Maintenance Management Team is in place to engage temporary technical and casual workers when additional



manpower is needed. This flexible approach ensures timely execution of tasks such as roofing sheet installation, ceiling grid suspension, and painting. The composition of skilled Labor are electricians, roofers, painters, and joiners for specialized tasks. While the Unskilled Labor are Helpers and general laborers for support roles like material handling, site cleaning, and waste disposal.

Labor Management Considerations include safety compliance where all workers will be briefed on safety protocols, especially for high-risk activities like roofing and waterproofing, an Environmental and Social Safeguards monitoring of Waste handling, noise control, and community engagement will be managed to minimize disruption and ensure compliance with E&S standards.

3.0 ASSESSMENT OF ENVIRONMENTAL AND SOCIAL RISKS, IMPACT, AND MITIGATION MEASURES

Assessment of Potential E&S Risks and Impacts, and mitigation measures the proposed office renovation, and refurbishment conforms to the SABER E&S exclusion list. The potential E&S risks anticipated in the renovation activities range from low to moderate types of risks. The risks are expected to be site-specific without likelihood of impacting beyond the project footprint and tend to have low probability of causing serious adverse effects to human health and/or the environment. A summary of potential negative E&S risks and impacts anticipated from the refurbishment and renovation are summarized in the table below.

Table 3: Potential E&S Risks and Mitigation Measures

Potential Risks and Impacts	Projects Stage	Assessment	Mitigation
Exposure to Occupational Health and Safety (OHS) hazards	Renovation and Operation	The various renovation activities such as roof replacement, ceiling replacement, painting of office, waterproofing of ceiling and fixing of various equipment could lead to Occupational Health and Safety (OHS) related risks through inappropriate use of PPE, slip and fall from heights, equipment cut, and noise generation	<ul style="list-style-type: none"> • The PCU will deploy a safety (OHS) officer at the site to monitor and offer regular sensitization. • The contractor will provide a safety poster at the entrance to sensitize and remind workers and visitors about safety measures at the site. • Include OH&S requirements in the contract with the contractor. • Provide OH&S orientation to workers, and other stakeholders. • Ensure all workmen have PPE for working on site, especially during the proposed operations. • the minimum PPE includes: <ul style="list-style-type: none"> Hard hat – Safety shoes – Overalls –



			<p>Gloves – Reflector vests</p> <p>Certain operations may require additional PPE such as:</p> <p>Earplugs – Eye protection glasses Face masks etc.</p> <ul style="list-style-type: none"> • No person is to enter the renovation site without the necessary PPE. • Working at height, provide a safe working platform with guardrails, fences, etc. – if not possible, provide properly installed personnel equipment such as rope access or safety harness and train staff/ensure only trained staff work at height. • Material stockpiles or stacks shall be stable and well secured to avoid collapse and possible injury to site workers. • Ensure that all equipment and hand tools are maintained and in safe operating condition. • Provide first aid boxes at the project site. • Investigate the cause of any accidents at the workplace and maintain a record of health and safety incidents. • Ensure the contractor implements noise control strategies, such as using low-noise equipment, scheduling noisy activities during less sensitive times. • Provide of an emergency response Plan including to address risks associated in working with electrical cable.
Public Health & Site Safety	Renovation	The various renovation activities could lead to Public Health & Site Safety related risks through presence of hazardous areas such as dust, flammables substances, solid combustibles, etc.	<ul style="list-style-type: none"> • The site shall always remain with Worker on Site Sign or Danger sign. • Potentially hazardous areas such as dust are demarcated and clearly marked. • Adequate warning signs of hazardous working areas shall be erected in suitable locations. • Emergency numbers of the local police, clinic/hospital and fire department shall be placed in a prominent area. • Fire-fighting equipment should be placed in prominent positions across the site where it is easily accessible. This includes fire extinguishers, a fire blanket as well as



			<p>a water tank. Workers need to be trained on how to operate firefighting equipment.</p> <ul style="list-style-type: none"> • All flammable substances shall be stored in safe areas which do not pose an ignition risk. • Smoking may only be conducted in demarcated areas as agreed upon by the contractor's safety/OHS officer.
Electronic waste pollution	Renovation and Operation	<p>During the renovation of the site, the electronic devices that could result in generation of electronic waste and pollution include the existing equipment to be replaced or disposed of (computers and a drying oven, lamps, etc.). The equipment to be installed (LED lighting, solar panels, IT infrastructures, etc.) may also generate electrical and electronic waste at the end of its useful life.</p>	<ul style="list-style-type: none"> • Identify and link the e-waste to a licensed electronic waste vendor. • Maintain a separate storage space for all electronic waste. • Ensure that all electronic waste is securely and safely transferred to a licensed electronic waste dealer.
Air pollution, contribution to climate change	Renovation and Operation	<p>The renovation activities may lead to indiscriminate disposal of construction debris, packaging waste, unused materials, plant debris, etc. that alter the aesthetic beauty of the environment if not properly managed. The cement mixing and the use of other chemicals could also lead to soil contamination.</p>	<ul style="list-style-type: none"> • Provide waste bins at the renovation site. • Ensure that hazardous waste is disposed of according to legal and environmental guidelines. • Ensure regular disposal of bins at appropriate waste dump sites. • Ensure hygiene of the premise. • Sensitize workers on waste disposal arrangements. • Cement mixing and the use of other chemicals must take place on impermeable and bunded surfaces. • Where possible, ready mixed cement needs to be used for renovation activities and cement trucks washed in a designated preferably off-site washing area. • Any accidental spillages that occur on site must be contained, treated with absorbents, and disposed of at a hazardous landfill site. • Where possible, recycle lab's materials like paper, plastic containers, and metal from equipment.



Non-compliance with labor and working conditions	Renovation and Operation	Due to high unemployment rate in Nigeria, there could be the tendency to pay workers below the minimum wage or employ persons below the age of 18.	<ul style="list-style-type: none"> Consistent with provisions in the SABER Labor Management Procedures, persons below the age of 18 years are prohibited from working on the project. The worker must always be assured of receiving a salary at least equal to the minimum wage of the professional category to which the job in question falls. No worker employed on the renovation project must be paid below the statutory minimum wage applicable in the host country (Nigeria).
Potential exposure to Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH).	Renovation and Operation	During the renovation activities and the operation, multiple Interfaces between and among project workers and the building occupants could lead to instances of SEA/SH/GBV.	<ul style="list-style-type: none"> Include SEA/SH prohibitions and sanctions in the Workers' code of conduct and enforce compliance. Display visible posters on SEA/SH prohibition at site to discourage SEA/SH and expected behavior. Provide mandatory training and awareness raising for the workforce and community members on SEA/SH prohibition. Inform workers and building occupants about national laws and institutional policies that make sexual harassment and gender-based violence a punishable offence. Provide safe and suitable toilets and washing facilities, separate for men and women workers. Provide safe and confidential grievance channels easily accessible to all stakeholders
Absence of appropriate grievance channels	Renovation and Operation	Absence of appropriate channels to receive and handle concerns from workers and building occupants could lead to apathy and tensions.	<ul style="list-style-type: none"> Decentralize SABER PCU institutional grievance mechanism to cover this operation. Appoint one woman and a man to serve as grievance focal persons on renovation activities and train them on how to receive and refer complaints. Ensure prompt escalation of accident and SEA/SH cases to the SABER E&S specialist.
Supply chain related E&S risks	Renovation	During renovation activities suppliers may be contracted for procurement of materials and equipment leading to some risks	<ul style="list-style-type: none"> Obtain supplies (sand, concrete, etc.) from authorized quarries. Avoid procuring materials and equipment from companies with allegations of child and/or forced labor.



		including practices that harm the environment, poor working conditions, child labor, forced labor, and unfair wages in the supply chain, etc.	<ul style="list-style-type: none"> Conduct E&S due diligence and include E&S clauses against child and forced labor in contractor's contracts.
Lack of awareness among workers on the E&S risks and requirements	Renovation and Operation	Lack of awareness among workers on the E&S risks and requirements of the Project during the different stages of the project could lead to environmental impacts, OHS risks and non-compliance with regulations.	<ul style="list-style-type: none"> The Contractor shall provide training to all his workers, before they start working on site, on basic ESHS risks associated with the proposed construction works and the workers' responsibility. Contractor's site engineers will provide a brief daily toolbox talk to the construction workers on ESHS risks associated with the construction activity that will be carried out on that day. The Contractor's training program will also cover topics related to Code of Conduct such as sexual harassment particularly towards women and children, violence, including sexual and/or gender-based violence and respectful attitude while interacting with the local community.

3.1 ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS MANAGEMENT PLAN SUMMARY

Table 4: E&S Risks and Impacts Management Plan

Type of Risk	Potential Impacts	Key Receptors	Risk Level	Proposed Mitigation Measures	Responsible	Estimated Cost (US\$)
	Planning Phase					
SABER staff not aware of E&S requirement	Non-compliance with SABER E&S requirements	Alliance	moderate	Train staff on E&S requirements and procedures under the SABER project and for the E&S risks and impacts related to refurbishment and renovation of the	E&S Specialists	Nil, virtual training



				building to host the Regional Hub.		
Site workers not aware of E&S requirement	Non-compliance with ESMP	workers	Moderate	Training of site workers on applicable SABER E&S safeguard requirements, particularly waste disposal, grievance mechanism, labor rights and working condition, wages and payment conditions, code of conduct, child labor and SEA/SH prohibitions, and occupational health and safety measures.	E&S Specialist	250
Implementati on Phase						
Exposure to occupational health and safety hazards	Injuries, accidents, disruption of workflow etc.	Workers & Visitors	Moderate	<ul style="list-style-type: none"> Place a safety (OHS) officer at the site. Provide a safety poster at the entrance to sensitize and remind workers and visitors about safety measures at the site. Include OH&S requirements in the workers' Code of Conduct (CoC). Include OH&S requirements in the contract 	Project Lead E&S Specialist	600



				<p>with the contractor.</p> <ul style="list-style-type: none"> • Provide OH&S orientation to workers, and other stakeholders. • Procure and provide relevant PPE for staff working on site. The minimum PPE includes: <ul style="list-style-type: none"> - Hard hat - Safety shoes - Overalls - Gloves - Reflector vests • Certain operations may require additional PPE such as: <ul style="list-style-type: none"> - Earplugs - Eye protection glasses - Face masks etc. • No person is expected to enter the renovation site without the necessary PPE. 		
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				<ul style="list-style-type: none"> • Working at height: Provide a safe working platform with guardrails, fences, etc. – if not possible, provide properly installed personnel equipment such as rope access or safety harness and train staff/ensure only trained staff work at height. • Material stockpiles or stacks shall be stable and well secured to avoid collapse and possible injury to site workers. • Ensure that all equipment and hand tools are maintained and in safe operating condition. • Provide first aid boxes at the project site with trained personnel. • Investigate the cause of 		
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				<p>accidents at the workplace and maintain a record of health and safety incidents.</p> <ul style="list-style-type: none"> Workers should have the right to refuse work in unsafe conditions. Implement noise control strategies, such as using low-noise equipment, scheduling noisy activities during less sensitive times. Provide of an emergency response Plan including to address risks associated in working with electrical cable. 		
Public Health & Site Safety	Injuries, accidents	Workers, Residents	Moderate	<ul style="list-style-type: none"> The site shall always remain fenced. Potentially hazardous areas such as trenches are to be demarcated and clearly marked. Adequate warning signs 	Project Lead E&S Specialist	400



				<p>of hazardous working areas shall be erected in suitable locations.</p> <ul style="list-style-type: none">• Emergency numbers of the local police, clinic/hospital and fire department shall be placed in a prominent area.• Firefighting equipment shall be placed at prominent positions across the site where it is easily accessible. This includes fire extinguishers, a fire blanket as well as a water tank. Workers need to be trained on how to operate the firefighting equipment.• All flammable substances shall be stored in safe areas which do not pose an ignition risk.• Smoking may only be		
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				conducted in demarcated areas as agreed upon by the contractor's safety/OHS officer.		
Emissions from the construction equipment and vehicles and from operation e.g. use of air conditioner	Air pollution, contribution to climate change	Workers	low	<ul style="list-style-type: none"> The Contractor shall service all equipment regularly to minimize emissions and maintain the record. During operation SABER PCU should promote Energy-efficient Air Conditioners and Air conditioner refrigerant with lower global warming potential. Regular maintenance of the equipment. 	Project Lead	Nil
Indiscriminate disposal and improper handling of solid waste at the project site	Land and water pollution, alteration of aesthetic beauty of the environment.	Residents, land, surface water	Low	<ul style="list-style-type: none"> Provide waste bins at the renovation site. Ensure that hazardous wastes are disposed of according to legal and 	Contractors E&S Specialist	150



				<p>environmental guidelines.</p> <ul style="list-style-type: none"> • Ensure regular disposal of bins at appropriate waste dump sites. • Ensure hygiene of the premise. • Sensitize workers and farmers on waste disposal arrangements. • Cement mixing and the use of other chemicals must take place on impermeable and bunded surfaces. • Where possible, ready mixed cement needs to be used for renovation activities and cement trucks washed in a designated preferably off-site washing area. • Any accidental spillages that occur on site must be contained, treated with 		
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				absorbents, and disposed of at a hazardous landfill site.		
Non-compliance with labor and working conditions.	Labour Exploitation	Contractors and Project Workers	Low	<ul style="list-style-type: none"> Consistent with provisions in the SABER Labor Management Procedures, persons below the age of 18 years are prohibited from working on the project. The worker must always be assured of receiving a salary at least equal to the minimum wage of the professional category to which the job in question falls. No worker employed on the renovation project must be paid below the statutory minimum wage applicable in the host country. 	Contractors E&S Specialist	nil
Sexual Exploitation and Abuse (SEA)/Sexua	Workers and other staff members are being sexually exploited.	Workers, Staff	Low	<ul style="list-style-type: none"> Include SEA/SH prohibitions and sanctions 	E&S Specialist	150



1 Harassment (SH)	Violation of sexual privacy.			<p>in the Workers' code of conduct and enforce compliance.</p> <ul style="list-style-type: none"> • Display visible posters on SEA/SH prohibition at site to discourage SEA/SH and expected behavior. • Provide mandatory training and awareness raising for the workforce and community members on SEA/SH prohibition. • Inform workers and community members about national laws and institutional policies that make sexual harassment and gender-based violence a punishable offence. • Provide safe and suitable toilets and washing facilities, separate for 		
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				<p>men and women workers.</p> <ul style="list-style-type: none"> • Provide safe and confidential grievance channels easily accessible to all stakeholders. 		
Absence of appropriate grievance channels	Tensions, apathy, and institutional reputational damages.	Workers and other stakeholders	Low	<ul style="list-style-type: none"> • Involve a diverse group of stakeholders, including women, in the planning and decision-making processes. • Implement designs that address the specific needs and concerns of all genders, focusing on safety, accessibility, and usability. • Strict measures on sexual harassment, making workplaces more comfortable, appropriate, and safe for women. 	Contractors E&S Specialist	Nil
Lack of awareness among	degradation such as improper waste disposal,	Contractors , SABER PCU	Moderate	<ul style="list-style-type: none"> • The Contractor shall provide 	Contractors	nil



workers on the E&S risks and requirements of the Project	inefficient use of resources, pollution, etc. Increase of accidents and incidents, damage to company reputation, etc.			<p>training to all his workers, before they start working on site, on basic ESHS risks associated with the proposed construction works and the workers' responsibility.</p> <ul style="list-style-type: none"> • Contractor's site engineers will provide a brief daily toolbox talk to the construction workers on ESHS risks associated with the construction activity that will be carried on that particular day. • The Contractor's training program will also cover topics related to Code of Conduct such as sexual harassment particularly towards women and children, violence, including 	E&S Specialist	
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				sexual and/or gender-based violence and respectful attitude while interacting with the local community.		
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3.2 INSTITUTIONAL ARRANGEMENTS AND RESPONSIBILITIES FOR IMPLEMENTING THE ESMP

The implementation of material actions contained in this ESMP will be the primary responsibility of the SABER PCU. For this purpose, SABER PCU has designated its occupational health and safety officers based in Ibadan to hand in the day-to-day implementation of E&S measures contained in this ESMP. The SABER Senior E&S Specialist will provide additional capacity building and monitoring oversight for the implementation of all actions. The detailed level of oversight, responsibility, and key roles are provided in the table below:

Table 5: Institutional Roles and Responsibilities in the implementation of the ESMP.

Institution/Lead Person	Roles and Responsibilities
E&S Specialist	<ul style="list-style-type: none"> • Provide guidance and advice on best E&S practices. • Assist in resolving complex E&S issues. • Review and analyze reports submitted by OHS staff. • Ensure comprehensive documentation of E&S activities. • Provide advanced E&S training workshops. • Identify areas for capacity building in coordination with OHS staff. • Coordinate with external stakeholders when necessary. • Conduct periodic evaluations of E&S implementation. • Provide feedback and recommendations for improvement.
Program Manager	<ul style="list-style-type: none"> • Oversee daily E&S measures implementation. • Ensure adherence to safety protocols. • Conduct regular inspections. • Maintain records of E&S measures • Report any incidents or breaches in protocols. • Prepare regular compliance reports. • Conduct regular E&S training for staff. • Coordinate with SABER Specialist for E&S strategy implementation. • Monitor the effectiveness of E&S measures. • Report on the progress of E&S goals. • Manage immediate response to E&S emergencies. • Engage with stakeholders and address concerns related to E&S.



- | | |
|--|---|
| | <ul style="list-style-type: none">• Ensure compliance with the mitigation measures of the ESMP. |
|--|---|

4.0 GRIEVANCE MECHANISM

Two major grievance mechanisms are currently available for all workers and stakeholders working under the project for reporting of grievances including SEA/SH. These include the SABER Grievance Mechanism (GM) provided in the SABER Stakeholder Engagement Plan (SEP). All workers will be informed of the grievance mechanism at the time of their engagement on the project including measures put in place to protect them against any reprisal for its use. The mechanism will also allow for anonymous complaints to be raised and addressed through providing options for people reporting a grievance to not mention their names, positions or place or workstation.

4.1 SABER GRIEVANCE MECHANISM

The SABER grievance mechanism, detailed in the Stakeholder Engagement Plan (SEP), provides an essential pathway for project workers and stakeholders to report grievances, including those related to SEA/SH. To further enhance this system, SABER PCU has designated one of its Occupational Health and Safety (OHS) officers as a grievance focal person. This appointment aims to strengthen the grievance redressal process, allowing for more efficient and direct handling of complaints within SABER PCU. Multiple channels are available for lodging complaints through the SABER mechanism, including emails, phone calls, text messages, and letters. These channels are designed to be accessible to all workers and community members, ensuring ease of reporting. Additionally, comprehensive information about this grievance mechanism will be widely disseminated to all workers and stakeholders. This effort is to ensure that they are fully aware of how to submit a complaint and understand the resolution process facilitated by the mechanism. Detailed information on the SABER GM is available in the project's SEP, approved by the World Bank.

4.2 THE SABER GRIEVANCE MECHANISM

4.2.1 Scope

The grievance mechanism procedure primarily applies to all SABER staff members (covering all types of employment contracts including, but without limitation to regular, consultants, part-time, contract of service and temporary employees), interns, visiting scientists, fellows, contractors, grantees, visitors, donors, volunteers, board members and vendors of the SABER centers.

4.2.2 Types of complaints

The mechanism handles complaints relating to three broad areas of Fraud related breaches: these include embezzlement, theft, bribery, and kickbacks. Compliance related breaches: these include unsafe working conditions, vandalism, falsification of contracts, reports, or records, non-



compliance to research ethics, etc.; and Human resource related breaches: these include sexual harassment, discrimination, abuse, bullying, conflict of interest, alcohol, substance abuse, etc.

Reporting/grievance uptake point Staff members and all other stakeholders may choose one of two ways to submit their reports: 1. Anonymous reporting using a SABER program wide external service provider known as SABER GMS. The provider has been commissioned by the SABER to manage anonymous reporting services for all the SABER centers through an ethics hotline. Cases can be reported to SABER GM anonymous reporting mail, Email sabergmreports@gmail.com and Toll-Free number: 234-28247998. Complaints received through these channels including cases linked with SEA/SH will be shared with the Safeguard Focal Person for record-keeping and reporting, and referral of SEA survivors to GBV service providers. OR 2. Direct reporting to a supervisor/manager/director/or a colleague.

4.2.3 Procedure for direct reporting

The whistle-blower/reporter shall prepare a written report to a supervisor/manager/ relevant director/program Manager, PM /other colleagues. If the report is made verbally, the person receiving the report shall capture the matter in writing and submit it to either the supervisor/manager/ director or PM. The person receiving the report shall acknowledge receipt of the report. The information provided shall be reviewed and may be the basis of an internal and/or external investigation into the issues which are reported. Procedure for anonymous reporting through the SABER GM ethics hotline

- The whistle-blower/reporter: Makes a call through the ethics hotline or accesses the online case management system platform and provides information to the external vendor (SABER GMS) which will be captured as a report.
- SABER GMS: Captures all the information and generates a report that will be shared with the designated recipient. May liaise with the whistle-blower/reporter to seek clarification, gather additional information and work with the whistle-blower as appropriate to build their confidence or encourage them to come out of anonymity (as may be relevant). Analyzes and shares the report with the designated case system administrator and designated recipient at employees' organization.
- Designated recipient: The designated recipients of the reports will generally be the directors of the institute and the reports that will be shared with them will align to their area of work according to the three broad areas of breaches.
- The designated recipient will: Receive a copy of the report submitted to SABER GMS; and Review the report and consult internally to decide on the way forward.
- Case management investigator: Case management investigators are the designated investigators of the case, who shall investigate the case in accordance with institutional policies and procedures.



- Case management system (CMS) administrator: A PM will assume the role of a case management systems administrator responsible for updating case information on the SABER GMS platform in accordance with the institute's policies and procedures.

4.2.4 Investigation

- After receipt of the ethical report either directly or anonymously, an initial assessment shall be carried out to determine if there is a genuine concern. If the concern is considered to fall more properly within a different type of complaint procedure, such as a grievance, the whistle blower/reporter will be informed accordingly by the supervisor and PM and be provided with advice on how to proceed.
- If there are sufficient grounds to initiate a full investigation, a diverse committee shall be constituted by the Director General or his designate to investigate the matter and recommend the course of action to be taken. During the investigation, the alleged perpetrator(s) may be given the opportunity to represent their argument.
- The amount of contact between the individual submitting a report and the body investigating the concern will depend on the nature of the issue, the clarity of information provided, and whether the employee remains accessible for follow-up.
- Where breaches of duty are confirmed to have occurred, the investigation report will provide recommendations on what action is appropriate, which may involve disciplinary procedures of the institute. Action will be taken to correct the failure and avoid similar events in the future as well as to address the alleged perpetrator(s) of misconduct.

4.2.5 Conclusion of cases

- Management endeavors to conclude all cases under investigation within a month of the start of the process, although it is recognized that there may be exceptions depending on the circumstances due to the low risk identified in the renovation activity.
- At the discretion of the Office and subject to legal and other constraints, the reporter may receive information about the outcome of an investigation.
- Should the whistle-blower/reporter still feel either victimized or disadvantaged following the report and subsequent investigation, they may choose to escalate the issue to the next level in the form of an appeal to the next level of authority. Should the issue raised be with reference to the Program Manager, then the whistleblower/reporter shall raise it with the National Coordinator. In the event that the matter is with regards to the Director General, it may be raised with the Chair of the Board and subsequently in cases where the matter refers to the Chair of the Board, the staff member may raise it directly with the Director of the SABER Internal Audit Unit.

4.3 INDICATIVE BUDGET FOR IMPLEMENTATION OF ESMP.

The following project activities will be undertaken to facilitate the implementation of this ESMP:

- Public disclosure of the ESMP in national newspapers.



- Sensitization of project partners, workers, and stakeholders on the E&S risk mitigation measures contained in this ESMP.
- Field monitoring of compliance with mitigation measures in this ESMP. All the activities outlined above will be financed from the project budget, and the estimated cost for implementing these activities is presented in table 6 below.

Table 6: Indicative Budget

#	E&S Activity	Estimated Cost (USD)
1.	Disclosure of ESMP	200
2.	Sensitization of Workers	300
3.	Implementation of Measures in E&S risks mitigation table	3850
4.	Site monitoring, supervision and reporting on E&S aspects	1500
	Total	5850

5.0 CONCLUSION

SABER PCU acknowledges that the activities and operations to be carried out during the renovation and replacement of roof and ceiling of the SABER PCU office could potentially impact on the environment, workers, and therefore very mindful of their obligations towards the protection of the environment and ensuring the health and safety of the workers. SABER PCU will therefore facilitate relevant sensitization and capacity-building activities to ensure rigorous implementation of all material actions considered in this ESMP, as well as other complementary E&S instruments.



ANNEX I - E&S RISK SCREENING

A. Key Activities especially those involving demolition and waste:

1. Removing Existing Roofing Sheets (Item A1)

- Environmental Risks: Dust and debris generation, Potential for hazardous materials (e.g., asbestos if present) and Noise pollution.
- Social Risks: Worker safety during dismantling at height and, Disruption to nearby occupants or operations.

2. Carting Away and Disposal of Construction Waste (Items A1, A2)

- Environmental Risks: Improper disposal could lead to soil and water contamination and overloading of local waste management systems.
- Social Risks: Traffic disruption during transport and Community complaints if waste is not managed properly.

3. Waterproof Felt Installation (Items C1, C2)

- Environmental Risks: Use of bituminous materials and primer gas may emit VOCs (volatile organic compounds).
- Social Risks: Fire hazard during application and Health risks from fumes if not ventilated properly.

4. Painting Works (Item F1)

- Environmental Risks: Emission of VOCs from paints.
- Social Risks: Health risks to workers and occupants if not properly ventilated.

5. Electrical Trunking (Item D1)

- Social Risks: Risk of electric shock during installation and Need for proper insulation and safety compliance.

B. Environmental & Social (E&S) Requirements and Responsibilities for Construction Projects (Small Infrastructure)

1. E&S Management Framework

A. E&S Policy and Objectives

- Ensure the project complies with national environmental and social regulations, international standards (e.g., IFC Performance Standards, World Bank Environmental and Social Framework), and best practices.
- Promote sustainable development, minimize environmental degradation, and protect community well-being.

B. Contractor Prequalification

- Requirement: Contractors must demonstrate prior experience in E&S management on similar projects.
- Evaluation Criteria:



- Past E&S performance records.
- Availability of qualified E&S personnel.
- Existing Environmental and Social Management Systems (ESMS).

2. Roles and Responsibilities

Stakeholder	Responsibilities
Project Owner	<ul style="list-style-type: none"> • Define E&S requirements. • Monitor compliance. • Provide oversight and support.
Contractor	<ul style="list-style-type: none"> • Implement E&S measures. • Maintain E&S documentation. • Train workers on E&S practices. • Authority to stop work if non-conformities are identified.
E&S Officer (Contractor)	<ul style="list-style-type: none"> • Daily monitoring of E&S compliance. • Report incidents and non-conformities. • Liaise with local communities and authorities.
Independent Auditor (if applicable)	<ul style="list-style-type: none"> • Conduct periodic audits. • Recommend corrective actions.

3. Site Selection and Planning

3.1. Avoidance Criteria

- Environmentally Sensitive Areas: Avoid protected areas, buffer zones, and critical habitats.
- Natural Hazards: Avoid flood-prone zones, landslide-prone slopes, and seismic zones.
- Cultural Heritage: Avoid known archaeological, historical, or culturally significant sites.
- Water Bodies: Avoid rivers, streams, wetlands, and seasonal floodplains.
- Topography: Avoid long downhill stretches and slopes >10%; align roads with natural contours.
- Social Impact: Avoid areas requiring land acquisition or causing livelihood disruption.

3.2. Proximity Considerations

- Build as far as practical from:
 - Residential areas.
 - Sensitive receptors (schools, hospitals, religious centers).

4. Associated Facilities Management

All associated facilities must be included in the E&S risk management plan:

- Material Sources:



- Ensure legal and sustainable sourcing of sand, gravel, and backfill materials.
- Assess environmental impacts of quarries and borrow pits.
- Temporary Facilities:
 - Proper siting and management of:
 - Material storage areas.
 - Worker camps.
 - Equipment yards.
- Implement waste management, drainage, and erosion control measures.

5. Monitoring and Compliance

5.1. Monitoring Plan

- Regular site inspections.
- Air, water, and noise quality monitoring.
- Feedback mechanisms.

5.2. Non-Conformity Management

- Contractors are empowered to halt work if E&S non-conformities are observed.
- Immediate corrective action must be taken.
- Document all incidents and report to the Project Owner.

Checklist Item	Compliance Status (Yes/No)	Responsible Party	Comments
Contractor has prior experience in E&S management		Project Owner / Contractor	
Contractor has qualified E&S personnel		Contractor	
Contractor has authority to stop work for E&S non-conformities		Contractor	
Project avoids environmentally sensitive areas		Project Owner / Planner	
Project avoids areas prone to natural disasters		Project Owner / Planner	
Project avoids critical habitats		Project Owner / Planner	
Project avoids historical/cultural/archaeological sites		Project Owner / Planner	
Project avoids rivers, streams, and flood-prone areas		Project Owner / Planner	
Project avoids long downhill stretches and steep slopes		Project Owner / Planner	
Project avoids land acquisition or livelihood impacts		Project Owner / Planner	
Project is located away from residences and sensitive receptors		Project Owner / Planner	
Material sources (quarries, sand, gravel) are legally and sustainably sourced		Contractor	
Temporary facilities (storage, camps) are properly sited and managed		Contractor	
Waste management and erosion control measures are in place		Contractor	
Regular site inspections are conducted		E&S Officer	
Air, water, and noise quality are monitored		E&S Officer	
Feedback mechanisms are established		E&S Officer	



Non-conformities are documented and corrective actions taken

Contractor / E&S Officer

Stakeholder consultations are conducted

Project Owner / E&S Officer

Grievance Redress Mechanism is in place

Project Owner / E&S Officer

Timely updates are provided to affected persons

Project Owner / E&S Officer

C. E&S Office/Field Inspection Checklist

1. General Site Conditions

- Site boundaries clearly marked and secured
- Signage for safety, environmental, and community information
- Access roads and traffic management in place
- Emergency response equipment available and accessible

2. Environmental Compliance –

Air Quality

- Dust suppression measures (e.g., water spraying)
- Emissions from machinery controlled and within limits

Noise and Vibration

- Noise levels monitored and within acceptable limits
- Noise barriers or buffers near sensitive receptors

Water Management

- Proper drainage systems in place
- No contamination of nearby water bodies
- Sediment control measures (e.g., silt fences)

Waste Management

- Waste segregation and labeled bins
- Hazardous waste stored and disposed of properly
- No illegal dumping or burning of waste

3. Social Compliance

Environmental Relations

- Grievance redress mechanism visible and functional
- No unresolved complaints from local communities
- Community engagement records available

Worker Welfare

- Adequate worker accommodation and sanitation
- PPE (Personal Protective Equipment) used by all workers
- Health and safety training records available



Cultural Heritage

- No disturbance to known sites
- Chance-find procedures in place and understood by workers

4. Associated Facilities

- Material sourcing sites (quarries, borrow pits) inspected
- Temporary facilities (storage, camps) compliant with E&S standards
- Transport routes safe and environmentally sound

5. Documentation and Records

- E&S monitoring logs up to date
- Incident and accident report available
- Inspection reports and corrective actions documented



ANNEX 2: LABOUR MANAGEMENT PROCEDURES (LMP)

ABBREVIATIONS

Abbreviation Meaning

ESF	Environmental and Social Framework
ESS2	Environmental and Social Standard 2
FMF	Federal Ministry of Finance
GBV	Gender-Based Violence
GRM	Grievance Redress Mechanism
IPF	Investment Project Financing
LMP	Labour Management Procedures
OHS	Occupational Health and Safety
PCU	Program Coordination Unit
PEBEC	Presidential Enabling Business Environment Council
PPE	Personal Protective Equipment
SEA/SH	Sexual Exploitation and Abuse/Sexual Harassment
SABER	State Action on Business Enabling Reforms

1. INTRODUCTION

This Abbreviated Labour Management Procedures (LMP) has been prepared in accordance with the World Bank Environmental and Social Framework (ESF), particularly ESS2: Labour and Working Conditions.

The SABER IPF Technical Assistance Component supports institutional strengthening, technical assistance, capacity building, digital systems support, verification activities, and program coordination aimed at improving the business enabling environment in participating Nigerian states.

As the project does not finance major civil work, labour risks are expected to be low to moderate and manageable through implementation of these procedures.

The LMP (see main SABER LMP for detail additional information) is a living document and may be updated during project implementation where necessary.

2. OVERVIEW OF LABOUR USE

2.1 Categories of Workers



Worker Category	Description	Estimated Number
Direct Workers	PCU, PEBEC, DMO staff, consultants and technical advisors	10–20
Contracted Workers	ICT providers, logistics firms, trainers, verification agents, maintenance personnel	Variable
Primary Workers	Supply Suppliers of ICT equipment, furniture and office materials	Variable
Community Workers	Not anticipated	N/A

2.2 Characteristics of Workers

Workers will primarily consist of:

- Federal and project staff;
- Technical consultants and advisors;
- Verification and monitoring personnel;
- ICT technicians and service providers;
- Logistics and administrative support staff.

Both male and female workers will be engaged, with equal opportunity and non-discrimination principles applied throughout project implementation.

2.3 Timing of Labour Requirements

Labour requirements will span the project lifecycle and include:

Phase	Labour Activities
Mobilization	Recruitment, induction and onboarding
Implementation	Technical assistance, training, monitoring and ICT deployment
Verification	Independent verification and audits
Closure	Reporting, contract closeout and disengagement

3. KEY POTENTIAL LABOUR RISKS

Risk	Likelihood	Mitigation Measures
Occupational Health and Safety incidents	Medium	OHS training, supervision and PPE
Contractor non-compliance	Medium	Contractual clauses and monitoring
Delayed payment of workers	Low	Timely contract management
Excessive workload and travel fatigue	Medium	Work planning and duty-of-care measures



Risk	Likelihood	Mitigation Measures
GBV/SEA/SH risks	Low- Medium	Code of Conduct and awareness training
Workplace discrimination	Low	Equal opportunity policy
Child labour and forced labour	Low	Age verification and contractual prohibitions

4. LABOUR LEGISLATION

The project shall comply with:

- Labour Act Cap L1, Laws of the Federation of Nigeria 2004;
- Employee Compensation Act 2010;
- Factories Act Cap F1, LFN 2004;
- Trade Unions Act;
- National Occupational Safety and Health Policy;
- World Bank ESS2 on Labour and Working Conditions.

Where there is a gap between national legislation and ESS2, ESS2 requirements shall prevail.

5. RESPONSIBLE STAFF

Position	Responsibility
Program Coordinator	Overall oversight of LMP implementation
Environmental & Social Specialist	Day-to-day monitoring and reporting
Procurement Specialist	Labour clauses in procurement and contracts
Contractors/Consultants	Compliance with labour requirements
GRM Focal Person	Worker grievance management

6. POLICIES AND PROCEDURES

All project workers shall:

- Receive written contracts or terms of engagement;
- Be informed of their rights and responsibilities;
- Work in safe and healthy conditions;
- Receive OHS orientation and training where necessary;
- Adhere to the Project Code of Conduct;
- Be protected from discrimination, harassment, SEA/SH and retaliation.

All incidents, accidents and near misses shall be reported immediately through established reporting channels.

7. AGE OF EMPLOYMENT

The minimum age for employment under the SABER Project shall be **18 years**.

Measures include:



- Verification of age prior to engagement;
- No engagement of child labour;
- Immediate corrective action if underage workers are identified;
- Prohibition of forced, bonded or trafficked labour.

8. TERMS AND CONDITIONS

All workers shall receive:

- Clear contractual arrangements;
- Defined working hours and remuneration;
- Leave entitlements in accordance with applicable laws;
- Safe working conditions;
- Equal opportunity and fair treatment.

Contractors shall provide equivalent conditions consistent with national legislation and ESS2 requirements.

9. WORKER GRIEVANCE MECHANISM

A Worker Grievance Redress Mechanism (GRM) shall be available to all project workers.

Process

1. Complaint submitted verbally or in writing.
2. Acknowledgement within 3 working days.
3. Investigation and response within 15 working days.
4. Escalation to PCU management if unresolved.
5. Access to judicial remedies remains available.

Anonymous complaints shall be accepted.

Worker GRM Contact

Telephone: 09118818882

Email: sabergmcomplain@gmail.com

10. CONTRACTOR MANAGEMENT

The PCU shall ensure contractor compliance through:

- Inclusion of labour requirements in bidding documents;
- Mandatory adherence to this LMP;
- Contractor monitoring and supervision;
- Corrective action for non-compliance;
- Verification of OHS measures and worker welfare arrangements.

11. PRIMARY SUPPLY WORKERS

Where credible concerns arise, corrective actions shall be required from suppliers. The project will assess suppliers of ICT equipment, furniture and other essential materials to ensure there are no significant risks related to:

- Child labour;
- Forced labour;
- Unsafe working conditions.



12. MONITORING AND REPORTING

Indicator	Frequency
Number of project workers	Quarterly
OHS incidents	Quarterly
Worker grievances received/resolved	Quarterly
Contractor compliance reviews	Quarterly
Child labour/forced labour complaints	As required

Monitoring results shall be included in periodic Environmental and Social performance reports submitted to the World Bank.

ANNEX 3: CODE OF CONDUCT

All workers shall:

- Treat others with dignity and respect;
- Refrain from discrimination, harassment, GBV and SEA/SH;
- Follow OHS requirements;
- Report unsafe conditions and incidents;
- Protect project information and assets;
- Comply with all project policies and procedures.

Violation of the Code of Conduct may result in disciplinary action, contract termination, or referral to relevant authorities.

A. Manager's Code of Conduct - Preventing Gender Based Violence (GBV) and Sexual Exploitation & Abuse (SEA)

Definitions:

Gender Based Violence (GBV) – is an umbrella term for any harmful act that is perpetrated against a person's will, and that is based on socially ascribed (gender) differences between males and females. It can be sexual, physical, psychological and economic in nature, and includes acts attempted or threatened, committed with force, manipulation, or coercion and without the informed consent of the survivor. A SURVIVOR is a person who has experienced GBV.

Sexual Exploitation and Abuse (SEA) is the actual or attempted abuse of a position of vulnerability, power, or trust for sexual purposes including but not limited to profiting monetarily or socially from sexual exploitation of another

Sexual harassment (SH) is the unwanted behavior of a sexual nature

Violence Against Children (VAC) is both physical and non-physical forms including neglect, maltreatment, exploitation and sexual abuse

Managers at all levels have responsibilities to create and maintain an environment that prevents GBV and SEA. They need to support and promote the implementation of the Company Codes of



Conduct. To that end, Project Managers are required to sign up to Codes of Conduct applicable to their managerial duties within the context and also sign the Individual Codes of Conduct. This commits them to support and develop systems that facilitate the implementation of this action plan and maintain a GBV-free, child-safe and conflict-free work environment. These responsibilities include but are not limited to:

Mobilization

- ✓ Establish a GBV/SEA Compliance Team from the contractor's and consultant's staff to write an Action Plan that will implement the GBV and SEA Codes of Conduct.
- ✓ The Action Plan shall, as a minimum, include the
- ✓ Standard Reporting Procedure to report GBV and SEA issues through the project Grievance Redress Mechanism (GRM);
- ✓ Accountability Measures to protect confidentiality of all involved; and,
- ✓ Response Protocol applicable to GBV survivors/survivors (including access to support coping and post-trauma management strategies) and perpetrators.
- ✓ Engagement of the services of social service providers (NGOs) with requisite skill in the prevention and management of GBV and SEA.
- ✓ Coordinate and monitor the development of the Action Plan and submit for review to the RAMP-PIU safeguards teams, as well as the World Bank prior to mobilization.
- ✓ Update the Action Plan to reflect feedback and ensure the Action Plan is carried out in its entirety.
- ✓ Provide appropriate resources and training opportunities for capacity building so members of the compliance team will feel confident in performing their duties. Participation in the Compliance team will be recognized in employee's scope of work and performance evaluations.
- ✓ Ensure that contractor, consultant and client staff are familiar with the RAMP GRM and that they can use it to anonymously report concerns over GBV and SEA.
- ✓ Hold quarterly update meetings with the compliance team to discuss ways to strengthen resources and GBV/SEA support for employees and community members.
- ✓ In compliance with applicable laws and to the best of your abilities, prevent perpetrators of sexual exploitation and abuse from being hired, re-hired or deployed. Use background and criminal reference checks for all employees.
- ✓ Ensure that when engaging in partnership, sub-grant or sub-recipient agreements, these agreements
 - a) incorporate this Code of Conduct as an attachment;
 - b) include the appropriate language requiring such contracting entities and individuals, and their employees and volunteers to comply with this Code of Conduct; and
 - c) expressly state that the failure of those entities or individuals, as appropriate, to take preventive measures against GBV and SEA, to investigate allegations thereof, or to take corrective actions when GBV/SEA has occurred, shall constitute grounds for sanctions and penalties.

Training



All managers are required to attend an induction manager training course prior to commencing work on site to ensure that they are familiar with their roles and responsibilities in upholding the GBV/SEA

Codes of Conduct.

- ✓ Provide time during work hours to ensure that direct recruits attend the mandatory induction training which covers GBV/SEA training required of all employees prior to commencing work on site.
- ✓ Managers are required to attend and assist with the NGO-facilitated monthly training courses for all employees. Managers will be required to introduce the trainings and announce results of consequential evaluations.
- ✓ Collect satisfaction surveys to evaluate training experiences and provide advice on improving the effectiveness of training.

Prevention

- ✓ All managers and employees shall receive a clear written statement of the company's requirements with regards to preventing GBV/SEA in addition to the training.
- ✓ Managers must verbally and in writing explain the company and individual codes of conduct to all direct recruits.
- ✓ All managers and employees must sign the individual 'Code of Conduct for GBV and SEA, including acknowledgment that they have read and agree with the code of conduct.
- ✓ To ensure maximum effectiveness of the Codes of Conduct, managers are required to prominently display the Company and Individual Codes of Conduct in clear view in public areas of the workspace. Examples of areas include waiting, rest and lobby areas of sites, canteen areas, health clinics.
- ✓ Managers will explain the GRM process to all employees and encourage them to report suspected or actual GBV/SEA
- ✓ Managers should also promote internal sensitization initiatives (e.g. workshops, campaigns, on-site demonstrations etc.) throughout the entire duration of their appointment in collaboration with the compliance team, service providers and in accordance to the Action Plan.
- ✓ Managers must provide support and resources to the compliance team and service provider NGOs to create and disseminate the internal sensitization initiatives through the Awareness-raising strategy under the Action Plan.

Response

- ✓ Managers will be required to provide input, final decisions and sign off on the Standard Reporting Procedures and Response Protocol developed by the compliance team as part of the Action Plan.
- ✓ Once signed off, managers will uphold the Accountability Measures set forth in the Action Plan to maintain the confidentiality of all employees who report or (allegedly) perpetrate incidences of GBV/SEA (unless a breach of confidentiality is required to protect people or property from serious harm or where required by law).



- ✓ Once a sanction has been determined, the relevant manager(s) is/are expected to be personally responsible for ensuring that the measure is effectively enforced, within a maximum timeframe of 14 days from the date on which the decision was made.
- ✓ Managers failing to comply with such provision can in turn be subject to disciplinary measures, to be determined and enacted by the company's CEO, Managing Director or equivalent highest-ranking manager. Those measures may include:
 - i. Informal warning
 - ii. Formal warning
 - iii. Additional Training
 - iv. Loss of up to one week's salary.
 - v. Suspension of employment (without payment of salary), for a minimum period of 1 month up to a maximum of 6 months.
 - vi. Termination of employment.

I do hereby acknowledge that I have read the foregoing Code of Conduct, do agree to comply with the standards contained therein and understand my roles and responsibilities to prevent and respond to GBV and SEA. I understand that any action inconsistent with this Code of Conduct or failure to take action mandated by this Code of Conduct may result in disciplinary action.

FOR THE EMPLOYER

Signed by _____

Title: _____

Date: _____

B. Individual Code of Conduct- Preventing Gender Based Violence

Definitions:

Gender Based Violence (GBV) – is an umbrella term for any harmful act that is perpetrated against a person's will, and that is based on socially ascribed (gender) differences between males and females. It can be sexual, physical, psychological and economic in nature, and includes acts attempted or threatened, committed with force, manipulation, or coercion and without the informed consent of the survivor. A SURVIVOR is a person who has experienced GBV.

Sexual Exploitation and Abuse (SEA) is the actual or attempted abuse of a position of vulnerability, power, or trust for sexual purposes including but not limited to profiting monetarily or socially from sexual exploitation of another

Sexual harassment (SH) is the unwanted behavior of a sexual nature

I, _____, acknowledge that preventing gender-based violence (GBV) is important. The company considers that GBV activities constitute acts of gross misconduct and are therefore grounds for sanctions, penalties or potential termination of employment. All forms of GBV are unacceptable be it on the work site, the work site



surroundings, or at worker's camps. Prosecution of those who commit GBV may be pursued if appropriate.

I agree that while working on the project I will:

- ✓ Consent to police background check.
- ✓ Treat women, children (persons under the age of 18), and men with respect regardless of race, color, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status.
- ✓ Not use language or behavior towards women, children or men that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.
- ✓ Not participate in sexual contact or activity with children—including grooming or contact through digital media. Mistaken belief regarding the age of a child is not a defense. Consent from the child is also not a defense or excuse.
- ✓ Not engage in sexual favours, for instance, making promises or favorable treatment dependent on sexual acts—or other forms of humiliating, degrading or exploitative behavior.
- ✓ Unless there is the full consent¹ by all parties involved, I will not have sexual interactions with members of the surrounding communities. This includes relationships involving the withholding or promise of actual provision of benefit (monetary or non-monetary) to community members in exchange for sex—such sexual activity is considered “non-consensual” within the scope of this Code.
- ✓ Attend and actively partake in training courses related to GBV as requested by my employer.
- ✓ Consider reporting through the GRM or to my manager any suspected or actual GBV by a fellow worker, whether employed by my company or not, or any breaches of this Code of Conduct.

About children under the age of 18:

- ✓ Wherever possible, ensure that another adult is present when working in proximity of children.
- ✓ Not inviting unaccompanied children unrelated to my family into my home unless they are at immediate risk of injury or in physical danger.
- ✓ Not sleep close to unsupervised children unless necessary, in which case I must obtain my supervisor's permission, and ensure that another adult is present if possible.
- ✓ Use any computers, mobile phones, or video and digital cameras appropriately, and never to exploit or harass children or to access child pornography through any medium (see also “Use of children's images for work related purposes” below).
- ✓ Refrain from physical punishment or discipline of children.
- ✓ Refrain from hiring children for domestic or other labour which is inappropriate given their age or developmental stage, which interferes with their time available for education and recreational activities, or which places them at significant risk of injury.
- ✓ Comply with all relevant local legislation, including labour laws in relation to child labour.

¹ **Consent** is defined as the informed choice underlying an individual's free and voluntary intention, acceptance or agreement to do something. No consent can be found when such acceptance or agreement is obtained through the use of threats, force or other forms of coercion, abduction, fraud, deception, or misrepresentation. In accordance with the United Nations Convention on the Rights of the Child, the World Bank considers that consent cannot be given by children under the age of 18, even in the event that national legislation of the country into which the Code of Conduct is introduced has a lower age. Mistaken belief regarding the age of the child and consent from the child is not a defense.



Use of children's images for work related purposes

When photographing or filming a child for work related purposes, I must:

- ✓ Before photographing or filming a child, assess and endeavor to comply with local traditions or restrictions for reproducing personal images.
- ✓ Before photographing or filming a child, obtain informed consent from the child and the parent or guardian of the child. As part of this I must explain how the photograph or film will be used.
- ✓ Ensure photographs, films, videos and DVDs present children in a dignified and respectful manner and not in a vulnerable or submissive manner. Children should be adequately clothed and not in poses that could be seen as sexually suggestive.
- ✓ Ensure images are honest representations of the context and the facts.
- ✓ Ensure file labels do not reveal identifying information about a child when sending images electronically.

Sanctions

I understand that if I breach this Individual Code of Conduct, my employer will take disciplinary action which could include:

- ✓ Informal warning.
- ✓ Formal warning.
- ✓ Additional Training.
- ✓ Loss of up to one week's salary.
- ✓ Suspension of employment (without payment of salary), for a minimum period of 1 month up to a maximum of 6 months.
- ✓ Termination of employment.
- ✓ Report to the police if warranted.

I understand that it is my responsibility to avoid actions or behaviors that could be construed as GBV or VAC or breach this Individual Code of Conduct. I do hereby acknowledge that I have read the foregoing Individual Code of Conduct, do agree to comply with the standards contained therein and understand my roles and responsibilities to prevent and respond to GBV and VAC. I understand that any action inconsistent with this Individual Code of Conduct or failure to take action mandated by this Individual Code of Conduct may result in disciplinary action and may affect my ongoing employment.

Signature: _____

Printed Name: _____

Title: _____

Date: _____

C. Contractor's Code of Conduct - Preventing Gender Based Violence (GBV) and Sexual Exploitation & Abuse (SEA)

Definitions:



Gender Based Violence (GBV) – is an umbrella term for any harmful act that is perpetrated against a person’s will, and that is based on socially ascribed (gender) differences between males and females. It can be sexual, physical, psychological, and economic in nature, and includes acts, attempted or threatened, committed with force, manipulation, or coercion and without the informed consent of the survivor. A SURVIVOR is a person who has experienced GBV.

Sexual Exploitation and Abuse (SEA) is the actual or attempted abuse of a position of vulnerability, power, or trust for sexual purposes including but not limited to profiting monetarily or socially from sexual exploitation of another

Sexual harassment (SH) is the unwanted behavior of a sexual nature

Violence Against Children (VAC) is both physical and non-physical forms including neglect, maltreatment, exploitation and sexual abuse

- The company is obliged to create and maintain an environment which prevents Gender Based Violence (GBV) and Sexual Exploitation & Abuse (SEA) issues. The company is also required to maintain an environment where the unacceptability of GBV and actions against children are clearly communicated to all those involved in the project. In order to prevent GBV and SEA, the following core principles and minimum standards of behavior will apply to all employees without exception:
- GBV/SEA constitutes acts of gross misconduct and are therefore grounds for sanctions, penalties and/or termination of employment. All forms of GBV/SEA including grooming are unacceptable, be it on the work site, the work site surroundings, project neighborhoods or at worker’s camps. Prosecution of those who commit GBV or SEA will be followed.
- Treat women, children (persons under the age of 18), and men with respect regardless of race, color, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status.
- Do not use inappropriate language or behavior towards women, children and men. This includes harassing, abusive, sexually provocative, derogatory, demeaning, or culturally inappropriate words, gestures, or actions.
- Sexual activity with children under 18—including through digital media—is prohibited. Mistaken belief regarding the age of a child and consent from the child is not a defense.
- Sexual favours or other forms of humiliating, degrading, or exploitative behavior are prohibited.
- Sexual interactions between contractors and consultant employees at any level and members of the communities surrounding the workplaces that are not agreed to with full consent by all parties involved in the sexual act are prohibited. This includes relationships involving the withholding/promise of actual provision of benefit (monetary or non-monetary) to community members in exchange for sex – such sexual activity is considered “non-consensual” within the scope of this Code.
- All employees are required to attend an induction training course prior to commencing work on site to ensure they are familiar with the GBV/SEA Code of Conduct.
- All employees must attend a mandatory training course once a month for the duration of the contract starting from the first induction training prior to commencement of work to reinforce the understanding of the institutional GBV and SEA Code of Conduct.
- All employees will be required to sign an individual Code of Conduct confirming their agreement to support GBV and SEA activities.



I do hereby acknowledge that I have read the foregoing Code of Conduct, do agree to comply with the standards contained therein and understand my roles and responsibilities to prevent and respond to GBV and SEA. I understand that any action inconsistent with this Code of Conduct or failure to act mandated by this Code of Conduct may result in disciplinary action.

FOR THE COMPANY

Signed by _____

Title: _____

Date: _____



ANNEX 4: OCCUPATIONAL HEALTH AND SAFETY PLAN

Considering the potential for civil works to require medium to large scale labor, and the peculiarity of the civil, the Project will require a Project Occupational Health and Safety Management Plan. The plan will focus on workers' health and safety during the major civil work.

- **COMPETENCY**

All personnel required to operate or work with any equipment or machine must be competent, be tested for each equipment that he/she shall be operating. All personnel who as part of their profession require licensing or certification must obtain the necessary certification before he/she shall be allowed to work on the site.

- **FITNESS**

All personnel working on site shall be required to be certified medically fit to do so by an approved medical facility or Medical Doctor (pre-employment medical examination).

- **HSE TRAINING**

Induction/Orientation

Every new or rehired employee and Subcontractors employees must undergo mandatory OHS orientation / induction. The purpose of the Induction is to educate workers and make them aware of the major potential hazards he or she shall come into contact with while working on the site; also, it is one more opportunity to stress the importance of HSE being the first priority in operations.

The content of the HSE orientation / induction shall cover the following subjects:

- ✓ Site safety rules.
- ✓ Personnel protective equipment requirements (PPE).
- ✓ Environmental sensitivity and protection.
- ✓ Preparation and planning of the job (Daily Pre-task talk).
- ✓ Emergency plan and muster points.
- ✓ SEA/SH and GBV prevention strategies

Project Specific HSE Training

In addition to the HSE orientation /induction, there shall be specific site HSE trainings which shall cover the following topics:

- ✓ Manual handling.
- ✓ Electrical Safety
- ✓ Emergency Prevention, Preparedness and Response
- ✓ Work at height training
- ✓ First Aid training (for site First Aiders)
- ✓ Lifting and Rigging
- ✓ Safe Driving techniques (for drivers)

- **EMERGENCY PREPAREDNESS AND RESPONSE**



Emergency procedures and evacuation plan shall be developed by the HSE Department and displayed on the notice board. These procedures shall be communicated to all staff. Also, each section/department shall have always at least one trained first aider.

The contractor team should always have a trained first-aider present with well-equipped first aid box. For accidents which are beyond first aid/require medical attention, ill-health, disease outbreaks, health emergencies the contractor to liaise with the Primary Healthcare Centers present in each Ward and registered hospitals in the project areas to ensure timely medical attention (list of health facilities - <https://msdat.fmohconnect.gov.ng/state-health-facility>). The first essential emergency number you need to know in Nigeria is 112 by the Nigerian Emergency Management Agency (NEMA), National Hospital Abuja emergency line 09030097889, The Nigerian Red Cross Society (NRCS) emergency line, “234-8023-200-270, The ambulance emergency number – 767, The Police emergency number – 19.

• ***HSE IMPLEMENTATION AND PERFORMANCE MONITORING***

HSE Meetings

HSE management meetings shall be held once a month. The meeting is to help identify safety problems, develop solutions, review incident reports, provide training and evaluate the effectiveness of our safety program. Some of the meetings shall be:

- ✓ Project/Site Management HSE Meeting for management and supervision (Monthly).
- ✓ Tool box talk meetings for all workforce (Weekly).
- ✓ Pre-task briefing for all workforces (Daily).
- ✓ Special situation meeting (As required).

HSE Reporting

All incidents and illnesses must be reported to site supervisor after which investigation shall commence and recorded so that appropriate corrective actions shall be implemented to prevent any re-occurrence, and report findings shall be forwarded to management for review. Reporting requirements shall include notification of incident, investigation report, and monthly report. Notification of Incident form shall be developed which shall be filled in and submitted to HSE department for investigation.

HSE Inspection and Audits

For continual improvement of HSE management system, HSE inspection and audit shall be conducted. An inspection checklist shall be developed. This is to ensure that the HSE management system is being adhered to. The inspection shall be conducted by the HSE department together with site management.

Corrective and Preventive Actions and Non-Conformities



During the course of inspections, concerns raised shall be addressed and closed out. It is expected that in a period of two weeks, a close out inspection shall take place to verify that the corrective actions have been closed.

Project HSE Rules

The project HSE rules shall be developed, and supervision shall develop specific rules and procedures when necessary. The following site rules shall be always implemented. The Site Manager shall draw these rules to the attention of their own workmen or staff. All sub-contractors must ensure that these rules are drawn to the attention of their workmen and staff. The Principal Contractor may implement additional site rules during the contract programme. Any such additional rules shall be notified of all personnel engaged on the project prior to their implementation. The HSE rules shall include but are not limited to:

- ✓ Personal Protective Equipment must be always worn.
- ✓ All instructions issued by the Site Manager regarding the storage, handling or cleaning of materials, plants and equipment must be followed.
- ✓ All vehicles must be parked in the designated areas.
- ✓ Any workman suffering from a medical condition that might affect his work and/or that could require specific medical treatment must inform the supervisor before commencing work.
- ✓ All site tools shall either be battery operated or 110 volts.
- ✓ No one shall be permitted on site if it is believed that they are under the influence of alcohol or drugs.
- ✓ Vehicles must not reverse without a banksman in attendance.
- ✓ All visitors to site must undergo a site-specific induction and operative Identity badges must be always worn.
- ✓ All excavations must be arranged.
- ✓ Smoking and eating shall only be permitted in the designated area. This area shall be identified during induction.
- ✓ No hot works operations are permitted without a hot work permit in place.
- ✓ There should be no radios or other music playing devices on site.
- ✓ Good housekeeping practices to be adopted.
- ✓ Compliance with all Ethical Power Permit to Work systems
- ✓ The site keyed access procedure must be strictly adhered to.
- ✓ All Contractors must comply with Site Health & Safety Guidelines / Site Safety Method Statement
- ✓ No untrained worker shall be permitted to operate heavy machinery.

- ***SAFE WORK PRACTICES/PERSONAL PROTECTIVE EQUIPMENT (PPE)***

The basic PPE required for the project shall be Safety Glasses, Safety Boots, Hand Gloves, Hard Hat, ear plugs and Coverall. Any other PPE shall be used as applicable. Management is responsible for the provision of PPE and usage shall be always enforced.

PPE shall be provided in circumstances where exposure to hazards cannot be avoided by other means or to supplement existing control measures identified by a risk assessment. An assessment



shall be made to ensure that the PPE is suitable for purpose and is appropriate to the risk involved.

Information, instruction & training shall be given to all employees on safe use, maintenance and storage of PPE. Employees shall, in accordance with instructions given, make full use of all PPE provided and maintain it in a serviceable condition and report its loss or defect immediately to the maintenance department where it should be replaced.

PPE shall be replaced when it is no longer serviceable and returned on a new for old basis. Employees shall sign to state that they have received PPE when issued.

- ***WELFARE FACILITIES***

The provision of welfare facilities on the site shall be communicated to all operatives at site induction.

A cleaning regime shall be implemented and maintained for the duration of the construction phase to ensure the site welfare facilities remain in a clean and tidy condition.

If mains drinking water becomes unavailable during the construction phase bottled water shall be brought to site for all operatives for the necessary, period.

- ***SIGNAGE***

Adequate provision for warning and directional signs shall be made.

- ***RESPONSIBILITIES***

The PIU (OHS Responsibilities)

1. The PIU has a responsibility to ensure the health and safety of all people working on all the components and sub-components, their own employees, Contractors, Subcontractors and agency employees. In this regard, the PIU through the PIU shall:
2. Define systems of work and requirements for Contractors and Subcontractors to ensure their health and safety on the site. This means that PIU will require Contractors and Subcontractors to follow safe systems of work, meet statutory and other requirements (Nigerian and International), and audit their capability to safely manage work performed by their own employees. A periodic audit by the PIU of the Contractors' work performance and systems including OHS should be required as partial basis for payment.
3. Provide information needed by the Contractors to document and carry our work in a safe manner.
4. PIU should provide information on hazards and their associated risks while working on any specific part of the project. This will enable Contractors document their procedures for managing work around hazardous conditions, and to ensure they are aware of these hazards. PIU will do this by providing a set of requirements and safe work procedures through the Terms of Reference (TOR) in the Contractors contract document. It should also highlight Risk and Control Assessments, Work Control Permits, etc.



5. Review Contractors' Safe Work Mode Method Statements to ensure they comply with Bank's Environmental and Social safeguards and statutory HSE Requirements.
6. Ensure that Contractors follow all safety and environmental requirements.
7. PIU should monitor health and safety during rehabilitation works. Pre-start checks; inspections and audits will be conducted while on-site. These checks will look at work practices and methods, equipment conditions and suitability, and competency of people through checking the permits, licenses etc. Individuals are not permitted to bring, use or be under the influence of alcohol or non-prescribed drugs on-site.

Contractors' Responsibilities

1. Contractors are responsible for ensuring that their work methods consider and incorporate best practice and safety requirements.
2. Contractors are responsible for ensuring that safety and health hazards associated with the work they are performing are satisfactorily controlled and do not pose a risk. In the process of carrying out their work a Contractor may introduce other hazards. The identification and control of these hazards is the responsibility of the Contractor. These hazards and controls identified by the Contractor must be considered in the Work Method Statements.
3. Contractors are responsible for ensuring the health and safety of their employees including Sub- Contractors. This means that the Contractor is responsible for ensuring that:
 - a) their employees and subcontractors are adequately trained and competent in performing their tasks, and in basic safety procedures.
 - b) are provided information about processes and materials which are hazardous.
 - c) are issued with appropriate safety equipment and have appropriate instruction in its use.
 - d) have safe work methods and are adequately supervised to ensure safe work.
 - e) workplace safety inspections are regularly carried out.
 - f) there is access to first aid equipment and trained people
4. Contractors are responsible for ensuring their plants and equipment are safe. This means that Contractors' equipment and plants whether their own or hired is a) in a serviceable condition with regular maintenance and inspections. b) suitable for the task it is to perform and 3) meets the PIU requirements. The primary concerns of plants are that:
 - All guards are in place and secure
 - Relevant safety equipment is fitted and working
 - Operating controls (indicators, brakes, steering etc.) are working properly b) possible safety or environmental risk items are satisfactory. (hydraulic hoses, mufflers, exhaust emissions, fluid leaks etc.).